

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

IN RE:	)	
	)	
QUINTO DEBRAN SPENCER	)	Case No. 20-31478-KRH
	)	Chapter 13
Debtor	)	

**NOTICE OF MOTION TO EXTEND THE AUTOMATIC STAY AND HEARING**

The above-named Debtor, by counsel, has filed a Motion to Extend the Automatic Stay with the Court pursuant to 11 U.S.C. § 362(c)(3)(B). Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one.

**NOTICE IS HEREBY GIVEN THAT A HEARING ON THIS MOTION WILL BE HELD ON April 8, 2020 at 12:00 p.m. in Honorable Judge Kevin R. Huennekens' Courtroom, U.S. Bankruptcy Court, 701 E. Broad Street, Room 5000, Richmond, VA 23219.**

If you want to be heard on this matter, then no later than three (3) days before the date of the hearing, you or your attorney must:

1. File with the court, at the address below, a written response pursuant to Local Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough so that the Court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 E. Broad Street, Room 4000  
Richmond, VA 23219-3515

2. You must also mail a copy to:

James E. Kane, Esquire  
Kane & Papa, PC  
P.O. Box 508  
Richmond, VA 23218

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief.

Respectfully submitted,

QUINTO DEBRAN SPENCER  
By Counsel

/s/ James E. Kane  
James E. Kane (VSB# 30081)  
Kane & Papa, P.C.  
P. O. Box 508  
Richmond, Virginia 23218-0508  
Telephone (804) 225-9500  
Counsel for Debtor

**CERTIFICATE OF SERVICE**

I certify that on March 25, 2020, I have transmitted a true copy of the foregoing document electronically through the Court's CM/ECF system or by mail to the Debtors, Chapter 13 trustee, the United States trustee if other than by the electronic means provided for at Local Bankruptcy Rule 2002-1, all attorneys appearing in the previous case as listed below, and to all creditors and parties in interest of the mailing matrix attached hereto.

/s/ James E. Kane  
Counsel for Debtor

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FOR THE EASTERN DISTRICT OF VIRGINIA**  
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IN RE:	)	
	)	
QUINTO DEBRAN SPENCER	)	Case No. 20-31478-KRH
	)	Chapter 13
Debtor	)	

**MOTION TO EXTEND AUTOMATIC STAY**

COMES NOW the Debtor, by counsel, pursuant to 11 U.S.C. § 362(c)(3)(B) and files the following Motion to Extend Automatic Stay, and affirmatively states as follows:

**Jurisdiction**

1. Jurisdiction of this Court over the instant matter is based upon 28 U.S.C. §§ 1334 and 157 in that this action arises in and relates to the bankruptcy case of the Debtor.
2. This proceeding is a core proceeding under 28 U.S.C. § 157(b)(2)(A), (B), (K), and (O).
3. Venue is proper pursuant to 28 U.S.C. § 1409.
4. On March 16, 2020 (hereinafter the “Petition Date”), the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code (the “instant case”).
5. Within the year prior to filing the instant case, Debtor has been a debtor in one (1) pending Chapter 13 bankruptcy case.

WHEREFORE, the Debtor respectfully requests this Honorable Court to enter an Order extending the automatic stay as to all creditors, as to Debtor and the Debtor’s property, and as to

James E. Kane (VSB# 30081)  
KANE & PAPA, P.C.  
P. O. Box 508  
Richmond, Virginia 23218-0508  
Telephone (804) 225-9500  
*Counsel for Debtor*

the property of the estate for the duration of the instant case, and for such other and further relief as to the Court shall be deemed appropriate.

Respectfully submitted,

QUINTO DEBRAN SPENCER

By Counsel:

/s/ James E. Kane  
James E. Kane (VSB# 30081)  
KANE & PAPA, P.C.  
P. O. Box 508  
Richmond, Virginia 23218-0508  
Telephone (804) 225-9500  
*Counsel for Debtor*

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/s/ James E. Kane  
Counsel for Debtor

ADT Security  
PO Box 650485  
Dallas, TX 75265

BCC Financial  
PO Box 590067  
Fort Lauderdale, FL 33359

Bon Secours Memorial  
8260 Atlee Road  
Mechanicsville, VA 23116

Bon Secours Saint Marys Hosp  
8550 Mayland Drive  
Richmond, VA 23290

Bons Secours Health System  
7001 Forest Avenue  
Suite 2500  
Richmond, VA 23230

Cawthorn, Deskevich & Gavin  
9701 Metropolitan Court  
Suite C  
Richmond, VA 23226

Centra Southside Comm. Hosp.  
800 Oak St  
Farmville, VA 23901

Check City  
21 E Broad Street  
Richmond, VA 23219

City of Richmond  
Division of Delinquent Collect  
P.O. Box 26508  
Richmond, VA 23261

City of Richmond  
Dept of Public Utilities  
900 E. Broad St.  
Richmond, VA 23219

City of Richmond- Tax  
Bureau of Tax Enforcement  
900 East Broad St. Room 109  
Richmond, VA 23219

Diversified  
10550 Deerwood Park Blvd  
Jacksonville, FL 32256

Eos Cca  
Po Box 981008  
Boston, MA 02298

ER Solutions/Convergent Outsourcing, INC  
Po Box 9004  
Renton, WA 98057

Horizon Fin  
8585 Broadway #88  
Merrillville, IN 46410

IC System, Inc  
Attn: Bankruptcy  
Po Box 64378  
Saint Paul, MN 55164

Internal Revenue Service  
Centralized Insolvency Operati  
P. O. Box 7346  
Philadelphia, PA 19101-7346

Loyd A. Bonner, MD  
2401 W Leigh St #200  
Richmond, VA 23220

MCV Collection Department  
PO Box 980462  
Richmond, VA 23298

Midland Funding  
8875 Aero Dr Ste 200  
San Diego, CA 92123

Pmab Srvc  
4135 S Stream Blvd Ste 4  
Charlotte, NC 28217

Primary Health Care Associates  
7007 Harbour View Boulevard  
STE 108  
Suffolk, VA 23435

Radiology Consultants of Lynch  
PO Box 580085  
Charlotte, NC 28258

Time Payment Corporation  
16 NE Executive Park #200  
Burlington, MA 01803